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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LUANNE GOULD,

Plaintiff

-against-

05 CV 11118 (PBS)

LUCENT TECHNOLOGIES, INC.,

Defendant.

**PROPOSED
SCHEDULING ORDER**

Pursuant to Fed. Rule Civ. P. 26(f), the parties have conferred and propose the following discovery plan:

1. Initial Disclosures: The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) on or before **July 29, 2005**.
2. Factual Discovery: Except for good cause shown, all factual discovery shall be commenced in time to be completed by **November 21, 2005**.
3. Expert Discovery (if applicable): Case-in-chief experts must be identified by **March 1, 2006** and Rule 26 disclosures regarding experts are to be served by **April 3, 2006**. Rebuttal experts must be identified by **April 18, 2006**, and Rule 26 disclosures regarding rebuttal experts are to be served by **May 1, 2006**.
4. Dispositive Motions: Dispositive motions, if any, are to be served by **July 29, 2006**.
5. Pretrial Order: A joint pretrial order, if requested by the Court, shall be submitted by _____ or thirty days following the Court's decision on the dispositive motion, if one is made.
6. Trial: The parties shall be ready for trial on _____, or, if a dispositive motion is made, fifteen days following submission of the joint pretrial order. The estimated trial time is 5 days.
7. The parties agree that this Proposed Scheduling Order may be signed in counterparts.

Dated: July 28, 2005

HARVEY & KLEGER

EPSTEIN, BECKER & GREEN, P.C.

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SO ORDERED.

Hon. Patty B. Saris
U.S.M.J.

Date: _____, 2005